

Case No. 2:23-cv-05664-HDV-MAR
DEFENDANT TRADER JOE'S UNITED'S MOTION FOR ATTORNEYS'
FEES - TABLE #1

Topic in bold

Title	Atty	Date	Description	Hours worked	Rate
			Prelitigation		
Partner	RS	2023-06-27	Reviewed Kathryn Cahan email sent to Jamie Edwards regarding Trademark (TM) infringement and researched similar cases and found Medieval Times	0.5	\$1,056
Partner	SG	2023-06-27	Reviewed Kathryn Cahan email sent to Jamie Edwards regarding Trademark infringement	0.25	\$1,056
Partner	RS	2023-06-28	Phone conference with Cahan re letter	0.5	\$1,056
Partner	SG	2023-06-28	Legal research on trademark infringement relating to Kathryn Cahan email	1	\$1,056
Partner	RS	2023-06-28	Draft and finalize 6.28.23 letter to Cahan re TM claims	1.75	\$1,056
Partner	RS	2023-07-05	Reviewed 7.5.23 TJ letter from Cahan, case law research	0.5	\$1,056
Partner	SG	2023-07-05	Reviewed 7.5.23 TJ letter from Cahan, case law research	1	\$1,056
Partner	RS	2023-07-11	Trademark law research	3.75	\$1,056
Partner	SG	2023-07-11	Legal research on trademark TJ's case	2	\$1,056
			Motion to Dismiss		
Partner	RS	2023-07-13	Review Complaint and begin legal research on claims	3.25	\$1,056
Partner	SG	2023-07-13	Review and analyze Complaint	1.5	\$1,056
Partner	RS	2023-07-13	Check docket	0.25	\$1,056
Partner	SG	2023-07-14	Legal Research relating to July 13 Trademark infringement Complaint	1.5	\$1,056

Partner	RS	2023-07-23	Following up on service of complaint with client	0.5	\$1,056
Partner	SG	2023-08-15	Prep meeting for meet and confer with OC with Retu and Sonya	0.5	\$1,056
Partner	RS	2023-08-15	Meet and confer with opposing counsel	0.25	\$1,056
Partner	SG	2023-08-15	Meet and confer with Defendant's Counsel David Eberhart, Andrew Levad, Scott Pink, Sonya Mehta and Retu Singla	0.25	\$1,056
Partner	RS	2023-08-16	Draft motion to dismiss	5	\$1,056
Partner	RS	2023-08-17	Draft motion to dismiss	4	\$1,056
Partner	SM	2023-08-17	Review rules for filing MTD, legal research, edit motion, cite checking	4	\$777
Partner	SG	2023-08-17	Assist in Drafting Motion to Dismiss in Trademark case.	3	\$1,056
Partner	RS	2023-08-18	Draft motion to dismiss	4	\$1,056
Partner	SG	2023-08-18	Legal research and draft Motion to Dismiss for trademark case.	2.5	\$1,056
Partner	SM	2023-08-19	Edits to motion, additional research, RJN, proposed order, filing	6	\$777
Partner	SM	2023-08-19	Final proofing and cite checks to motion	2	\$777
Partner	SG	2023-09-05	Review OC letter citing case law, research case law	0.8	\$1,056
Partner	SG	2023-09-28	Discussion with Sonya on Medieval Times decision	0.4	\$1,056
Partner	SG	2023-10-04	Drafted and filed ULP charge against Trader Joe's for retaliatory civil lawsuit against the union.	0.5	\$1,056
Partner	SG	2023-10-19	Legal research to respond to Trader Joe's Trademark lawsuit	2	\$1,056
Partner	SG	2023-10-23	Draft TJU Response to TJ Opposition to Motion to Dismiss (Trademark	5	\$1,056
Partner	RS	2023-10-24	Draft Reply to OMTD	6	\$1,056
Partner	SM	2023-10-25	Review Reply to OMTD* date correction from declaration filing 46-3, Exh.	0.5	\$777

Partner	RS	2023-11-03	Review case law and prepare for oral argument with seth	1	\$1,056
Partner	SG	2023-11-03	Review case law and assist Retu Singla to prepare for Trademark court hearing on Motion to Dismiss	1	\$1,056
Partner	RS	2023-11-09	Oral argument prep	1	\$1,056
Partner	RS	2023-11-10	Oral argument	0.75	\$1,056
Partner	SM	2023-11-09	Hearing and follow up	1	\$777
Partner	SG	2023-11-09	Oral argument on MTD	0.75	\$1,056
			Communicate with clients		
Partner	SG	2023-06-28	Phone conference with National Officers to discuss response to Kathryn Cahan infringement letter.	0.5	\$1,056
Partner	RS	2023-07-05	Met with national Officers to discuss TJ letter and Union response	0.25	\$1,056
Partner	SG	2023-07-05	Met with national Officers to discuss TJ letter and Union response	0.25	\$1,056
Partner	RS	2023-07-06	Met with national Officers to discuss TJ letter and Union response	1	\$1,056
Partner	SG	2023-07-06	Met with national Officers to discuss TJ letter and Union response	1	\$1,056
Partner	RS	2023-07-26	Zoom conference with National officers to discuss status of the case.	1	\$1,056
Partner	SG	2023-07-26	Zoom conference with National officers to discuss status of the case.	1	\$1,056
Partner	RS	2023-07-28	Phone call with Seth and client to discuss Trademark case.	1.5	\$1,056
Partner	SG	2023-07-28	Phone call with client to discuss Trademark case strategy.	1.5	\$1,056
Partner	RS	2023-08-15	Report meet and confer to client	0.25	\$1,056
Partner	SG	2023-08-15	Discuss with client about the results of the meet and confer with defendant's attorneys in Trademark case	0.25	\$1,056
Partner	RS	2023-08-21	Discuss MTD with client	0.75	\$1,056
Partner	SG	2023-08-21	Discuss TM case status with TJU	0.75	\$1,056
Partner	RS	2023-09-28	Discussion with Seth and Client on Medieval Times	0.5	\$1,056
Partner	SG	2023-09-28	Discussion with Retu and Client on Medieval Times	0.5	\$1,056

			26(f) conference		
Partner	RS	2023-08-29	Discussion about 26f conference with Sonya, checked docket, responded to OMM request for conference	0.75	\$1,056
Partner	RS	2023-08-31	Review and analyze letter from Andrew Levad requesting 26(f) conference	0.25	\$1,056
Partner	RS	2023-09-01	Discussion about 26f conference with Sonya, checked docket, responded to OMM request for conference	0.5	\$1,056
Partner	RS	2023-09-11	Email to Andrew Levad 3rd request for 26(f) discovery	0.5	\$1,056
Partner	RS	2023-10-02	Review OMM email for 4th discovery request	0.25	\$1,056
Partner	SG	2023-10-02	Review email Eberhart letter for discovery	0.25	\$1,056
Partner	SG	2023-10-04	Drafted letter to David Eberhart, Esq. regarding discovery schedule	1	\$1,056
			SM Initial familiarization with case		
Partner	SM	2023-07-20	Call with Retu to learn about and sign on to case	0.5	\$777
Partner	SM	2023-08-14	TJU meeting with Retu to discuss next steps in case	0.25	\$777
Partner	SM	2023-08-14	Review complaint and file	2	\$777
Partner	SM	2023-08-22	Complete and file notice of interested parties	0.25	\$777
Partner	SM	2023-08-22	Review chambers copies rules	0.25	\$777
			Pro hac vice (PHV)		
Partner	RS	2023-08-07	Pro Hac Vice application for California District Court	1.3	\$1,056
Partner	SG	2023-08-07	Drafted and filed application with California District Court to appear Pro Hac Vice in Trademark case	1.5	\$1,056
Partner	SM	2023-08-21	Fill out and submit reimburse form for PHV	0.25	\$777
Partner	SM	2023-08-22	PHV reimburse follow up	0.25	\$777
Partner	SM	2023-08-29	Review and finalize PHV documents	1	\$777
			Legal research to obtain fees		
Partner	SM	2023-08-29	Antislapp legal research	1	\$777

Partner	SM	2023-09-12	AntiSLAPP legal research	1.5	\$777
Partner	SG	2023-11-13	Legal research on California Slap law	2	\$1,056
Partner	SM	2023-10-27	Rule 11 research	0.75	\$777
Partner	SM	2024-01-04	Rule 11 research - timing	0.5	\$777
Partner	SM	2024-01-16	Discussion of order and follow up tasks - attys fees options, Rule 11	0.5	\$777
Partner	SM	2024-01-17	Attys fees and rule 11 research - timing of filing	1.5	\$777
Partner	SM	2024-01-18	1927 sanctions	0.25	\$777
			Rule 11 safe harbor notice		
Partner	RS	2023-10-04	Letter to OMM on rule 11, 26f, and medieval times decision	2.25	\$1,056
Partner	RS	2023-11-11	Draft Rule 11 notice and motion	1	\$1,056
Partner	RS	2023-11-17	Draft Rule 11 notice and motion	2	\$1,056
Partner	RS	2023-12-19	Draft Rule 11 notice and motion	2	\$1,056
Partner	RS	2024-01-03	Draft Rule 11 notice and motion	3.5	\$1,056
Partner	RS	2024-01-04	Discuss with Sonya and Seth Safe harbor letter and Rule 11 Motion	0.5	\$1,056
Partner	SG	2023-11-11	Drafted and sent email to David Eberhart requesting a Section 7-3 meeting to discuss Rule 11 sanctions in Trademark case.	0.25	\$1,056
Partner	SG	2023-11-14	Meeting with David Eberhart Counsel for Trader Joe's to discuss Rule 11	0.1	\$1,056
Partner	SG	2023-11-14	research Rule 11 sanctions for Trader Joe's trademark case	1.5	\$1,056
Partner	SG	2023-12-01	Research Rule 11 sactions	1.5	\$1,056
Partner	SG	2023-12-11	Drafted Trader Joe's Rule 11 Sanctions Motion	1.5	\$1,056
Partner	SG	2023-01-04	Discuss with Sonya Mehta Defendant's Safe harbor letter and Rule 11	0.5	\$1,056
Partner	SG	2024-01-04	Email Safe harbor letter and draft Rule 11 Sanction Motion to David	0.1	\$1,056

			Notice of Supplemental Authority		
Partner	SM	2023-10-05	Review Medieval Times and draft Notice of supplemental authority	2.75	\$777
			Remote request to appear		
Partner	RS	2023-11-01	Phone call with SM re remote request	0.12	\$1,056
Partner	SG	2023-11-01	Phone call with SM re remote request	0.12	\$1,056
Partner	SM	2023-11-01	Draft remote request and declaration ISO request	1	\$777
			Motion for attorneys fees (AF)		
Partner	SM	2024-01-22	Motion for attorneys fees (AF) research	2.5	\$777
Partner	SM	2024-01-22	Motion for AF - Laffey and rates research	0.5	\$777
Partner	SG	2024-01-22	Draft dec for AF motion	3	\$1,056
Partner	SM	2024-01-23	Review Seth's dec	0.25	\$777
Partner	RS	2024-01-23	Motion for AF request to meet and confer	0.6	\$1,056
Partner	RS	2024-01-23	Draft declaration for AF	5	\$1,056
Partner	SM	2024-01-25	Draft Motion for AF	5	\$777
Partner	SM	2024-01-25	Review and integrate Singla dec into motion	0.25	\$777
Partner	SM	2024-01-25	Review and integrate Goldstein dec into motion	0.5	\$777
Partner	SM	2024-01-25	Relief sought hours worked review	0.25	\$777
Partner	SM	2024-01-25	Continue to integrate decs into motion	0.25	\$777
Partner	SM	2024-01-25	Draft argument	3	\$777
Partner	SM	2024-01-26	Edit motion, check cites	2	\$777
Partner	SM	2024-01-26	Call with Retu re dec and edits	0.25	\$777
Partner	SM	2024-01-26	Final dec review and integration, proposed order	1.25	\$777
Partner	SM	Future	Estimate for reply brief and hearing	12	\$777